

THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

DAVID J. CATANZARO,
286 Upper Powderly Street
Carbondale, Pennsylvania 18407

Plaintiff,

VS.

LYKART TECHNOLOGIES LLC,
GROWKART, TRANSFORN SR
BRANDS LLC, KMAR, KMAR.COM,
SEARS, SEARS.COM, ALPHABET
INC., GOOGLE LLC, YOUTUBE.COM,
POSHMARK INC., STL PRO, INC.,
TARGET CORPORATION,
TARGET.COM, TOTALHILL.COM,
MICROSOFT CORPORATION, INC.,
APPLE INC. and MOZILLA
CORPORATION

Defendants.

Case No. 3:22-cv-1754

Judge Joseph F. Saporito, Jr.

Referred to: Phillip J. Caraballo

JURY TRIAL DEMANDED

FILED
SCRANTON

MAR 12 2025

PER _____
Cp
DEPUTY CLERK

NOTICE OF ERRATA

Plaintiff, David J. Catanzaro proceeding pro se, hereby submits this Notice of Errata to correct a clerical error in the first paragraph of Plaintiff's proposed Verified Fifth Amended Complaint for Patent Infringement ("Fifth Amended Complaint") filed by the Clerk on March 7, 2025 [ECF 53] as part of Plaintiff's Motion For Leave. Plaintiff made an error by not including the words "**inducement of infringement**" and "**unjust enrichment**" in the initial paragraph, which was intended to summarize all claims asserted in the Fifth Amended Complaint.

ERROR:

The first paragraph of the Fifth Amended Complaint currently reads:

"Plaintiff, David J. Catanzaro ("Plaintiff" or "Mr. Catanzaro"), complains of Lykart Technologies, LLC, GrowKart, Alphabet Inc., Google LLC, Youtube.com, Poshmark Inc., Target Corporation, Target.com, Microsoft Corporation, Inc., Apple Inc. and Mozilla Corporation (collectively, "Defendants") for patent infringement, contributory infringement, and Willful blindness."

CORRECTION:

The first paragraph should correctly read:

"Plaintiff, David J. Catanzaro ("Plaintiff" or "Mr. Catanzaro"), complains of Lykart Technologies, LLC, GrowKart, Alphabet Inc., Google LLC, Youtube.com, Poshmark Inc., Target Corporation, Target.com, Microsoft Corporation, Inc., Apple Inc. and Mozilla Corporation (collectively, "Defendants") for patent infringement, contributory infringement, Willful blindness, inducement of infringement, and unjust enrichment."

REASON FOR CORRECTION:

This correction is necessary to accurately reflect all claims asserted in the Fifth Amended Complaint, specifically the claims for inducement of infringement and unjust enrichment, which were inadvertently omitted from the initial paragraph. This is a clerical error and does not alter the substance of the claims as presented in the complaint.

WHEREFORE, Plaintiff respectfully requests that this honorable Court accept this Notice of Errata and that this correction be noted and considered part of the official record of the Fifth Amended Complaint.

Date March 12, 2025

Respectfully submitted,



David J. Catanzaro
Plaintiff *pro se*
286 Upper Powderly Street
Carbondale, PA 18407
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CERTIFICATE OF SERVICE

I, David J. Catanzaro, hereby certify that on March 12, 2025 I have served a true and correct copy of Plaintiff's NOTICE OF ERRATA to the following parties via electronic mail, where available, and otherwise by first-class mail:

Lykart Technologies, LLC, and GrowKart
30 N Gould St Suite 5707
Sheridan, WY 82801, US

John V. Gorman
MORGAN, LEWIS & BOCKIUS LLP
2222 Market Street
Philadelphia, PA 19103
john.gorman@morganlewis.com

Bridget E. Montgomery,
ECKERT SEAMANS CHERIN & MELLOTT, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
bmontgomery@eckertseamans.com

Target Corporation & Target.com
1000 Nicollet Mall, Minneapolis,
Minnesota, 55403

Microsoft Corporation, Inc.
One Microsoft Way,
Redmond, WA 98052

Apple Inc.
One Apple Park Way
Cupertino, CA 95014

Mozilla Corporation
149 New Montgomery Street, 4th Floor,
San Francisco, CA 94105.

Date March 12, 2025



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